

**REMARKS**

Please note the fact that January 29, 2005, fell on a Saturday ensures that this paper is timely filed as of today, Monday, January 31, 2005 (the next succeeding day which is not a Saturday or Sunday).

Applicant and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. The Office is respectfully requested to reconsider the rejections presented in the outstanding Office Action in light of the following remarks.

Claims 1-18 were pending in the instant application at the time of the outstanding Office Action. Claims 1, 3, 9, 13, 17 and 18 are independent claims; the remaining claims are dependent claims. Claims 5-8 have been indicated by the Examiner as being allowable if rewritten in independent form and Claims 13-18 have been allowed.

Claims 1, 7, 9 and 11 have been rewritten. Claim 10 has been cancelled, its subject matter being incorporated into independent Claim 9. Claim 11 has been changed to depend from Claim 9, instead of now cancelled Claim 10. Applicant intends no change in the scope of the claims by the changes made by these amendments. It should also be noted these amendments are not in acquiescence of the Office's position on allowability of the claims, but merely to expedite prosecution.

Claim 7 has been objected to for an asserted informality. This claim has been rewritten to correct an obvious typographical error.

Claims 1 and 2 stand rejected under 35 USC § 102(b) as being anticipated by Hirano et al. Claims 3-4 and 9-12 stand rejected under 35 USC § 102(b) as being anticipated by Osdin. Reconsideration and withdrawal of this rejection is respectfully requested.

As best understood, Osdin appears to be directed to a Braille overlay sleeve for a mobile telephone keypad. (Title) As stated by Osdin, "[t]he aim of the present invention is to provide a keypad which will allow the use of a mobile telephone by the visually impaired". (Page 2, lines 3-6) Thus, the overlay preferably contains a tactually discernable relief pattern for each telephone key which is a character of the Braille or Moon writing systems. (Page 2, lines 9-19; Page 3, lines 4-5) Thus, the overlay merely provides the Braille or Moon equivalent of the number for the corresponding key.

Placing a Braille overlay which corresponds to the number of the underlying key is in stark contrast to the present invention. In accordance with the present invention, Braille dot combinations are constructed using the numerical keys. As discussed in the specification, to input "e" in 1 in Fig. 6, as shown in Fig. 5B, the numerical keys 11N for "1", "2" and "4" are manipulated and the pound sign key 11S is depressed. This establishes entry of the Braille dot combination corresponding to the dots P1, P2 and P3, i.e., the "e" in Braille (Ex. 1 in Fig. 7). (Paragraph 0060)

Claim 1 has been rewritten to recite, *inter alia*, "input means having multiple keys arranged in a multiple row, multiple column matrix, some of which are assigned to six dots for Braille". Claim 1 also recites, *inter alia*, "Braille specification means for specifying Braille dot combinations based on the locations of said keys identified by

said key identification means” and “character conversion means for converting said specified Braille dot combinations into corresponding characters”. Claim 3 similarly recites, *inter alia*, “wherein said processor specifies Braille dot combinations corresponding to said manipulations of said keys detected by said key detector, and converts said specified Braille dot combinations into characters that are output through said communication unit.” Similar language also appears in independent Claim 9.

It is respectfully submitted that Hirano et al. clearly falls short of present invention (as defined by Claim 1) in that, *inter alia*, it does not disclose “input means having multiple keys arranged in a multiple row, multiple column matrix, some of which are assigned to six dots for Braille”. It is also respectfully submitted that Osdin clearly calls short of the present invention (as defined by independent Claims 1, 3 and 9) in that, *inter alia*, it does not even address specifying Braille dot combinations based upon the location (or manipulation) of various keys; nor does it address converting the specified Braille dot combinations into characters. Accordingly, Applicant respectfully submits that the applied art does not anticipate the present invention because, at the very least, “[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under construction.” *W.L. Gore & Associates, Inc. v. Garlock*, 721 F.2d 1540, 1554 (Fed. Cir. 1983); *see also In re Marshall*, 198 U.S.P.Q. 344, 346 (C.C.P.A. 1978).

By virtue of dependence from what are believed to be allowable independent Claims 1, 3 and 9, it is respectfully submitted that Claims 2, 4-8, and 11-12 are also presently allowable. Applicant acknowledges that Claims 5-8 were indicated by the Examiner as being allowable if rewritten in independent form. Applicant reserves the

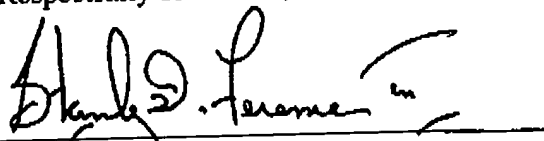
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right to file a new claim of such scope at a later date that would still, at that point, presumably be allowable. Applicant also acknowledges that Claims 13-18 have been allowed.

The "prior art made of record" has been reviewed. Applicant acknowledges that such prior art was not deemed by the Office to be sufficiently relevant as to have been applied against the claims of the instant application. To the extent that the Office may apply such prior art against the claims in the future, Applicant will be fully prepared to respond thereto.

In summary, it is respectfully submitted that the instant application, including Claims 1-9 and 11-18, is presently in condition for allowance. Notice to the effect is hereby earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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